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Response to Office Action Dated 12/02/2004

**REMARKS**

A review of the claims indicates that: Claims 1-13, 42-50 and 99-103 remain in their original form; Claims 41, 82-92 and 98 are currently amended; and Claims 14-40, 51-81, 93-97 and 104-105 were previously withdrawn.

In view of the following remarks, Applicant respectfully requests reconsideration of the rejected claims.

**35 U.S.C. §102 Rejections**

Applicant submits that the Office has failed to establish a *prima facie* case of anticipation and respectfully traverses the Office's rejections. However, before discussing the substance of the Office's rejections, a section entitled "The §102 Standard" is provided and will be used in addressing the Office's rejections. Following this section, a section entitled "The Acklen Reference" is provided, which describes Acklen's disclosure and teachings.

**The §102 Standard**

According to the MPEP §2131, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the claim.

Anticipation is a legal term of art. The applicant notes that in order to provide a valid finding of anticipation, several conditions must be met: (i) the reference must include every element of the claim within the four corners of the reference (see MPEP §2121); (ii) the elements must be set forth as they are recited

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1 in the claim (see MPEP §2131); (iii) the teachings of the reference cannot be  
2 modified (see MPEP §706.02, stating that "No question of obviousness is present"  
3 in conjunction with anticipation); and (iv) the reference must enable the invention  
4 as recited in the claim (see MPEP §2121.01). Additionally, (v) these conditions  
5 must be simultaneously satisfied.

6 The §102 rejection of claims 1-12, 41-43, 82-84, 98, 102 and 103 is  
7 believed to be in error. Specifically, the PTO and Federal Circuit provide  
8 that §102 anticipation requires that each and every element of the claimed  
9 invention be disclosed in a single prior art reference. *In re Spada*,  
10 911 F.2d 705, 15 USPQ2d 1655 (Fed. Cir. 1990). The corollary of this rule  
11 is that the absence from a cited §102 reference of any claimed element  
12 negates the anticipation. *Kloster Speedsteel AB, et al. v. Crucible, Inc., et*  
13 *al.*, 793 F.2d 1565, 230 USPQ 81 (Fed. Cir. 1986).

14 The applicant notes the requirements of MPEP §2131, which states  
15 "to anticipate a claim, the reference must teach every element of the claim."  
16 This MPEP section further states that "'A claim is anticipated only if each  
17 and every element as set forth in the claim is found, either expressly or  
18 inherently described, in a single prior art reference.' *Verdegaal Bros. v.*  
19 *Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053  
20 (Fed. Cir. 1987). 'The identical invention must be shown in as complete  
21 detail as is contained in the ... claim.' *Richardson v. Suzuki Motor Co.*, 868  
22 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements  
23 must be arranged as required by the claim, but this is not an ipsissimis verbis  
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1 test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831,  
2 15 USPQ2d 1566 (Fed. Cir. 1990)."

#### 4 The Acklen Reference

5 The Acklen reference describes aspects of the *user interface* for  
6 WordPerfect 9. The software underlying the user interface is not disclosed.  
7 Acklen describes the creation and modification of tables for HTML applications,  
8 such as web pages. (Page 583.) Acklen also discloses the use of "Floating Cells."  
9 (Page 429.) Floating cells are a method of working with spreadsheet data. In  
10 particular, floating cells are invisible cells that display their contents as if they are  
11 part of the text that surrounds them. (Id.) Thus, floating cells look like other text,  
12 and can be positioned by an insertion point where the floating cell is desired. (Id.)

#### 14 The Acklen Reference vs. Applicant's Background Section

15 The Acklen reference's disclosure of WordPerfect 9 technology is  
16 analogous to the Applicant's discussion of the Prior Art (See the Applicant's  
17 Background Section, from page 2, line 12 to page 3, line 24). In particular, the  
18 Applicant discusses object-oriented programming and OLE technologies, which  
19 provide a rich integration experience, wherein word processing and spreadsheet  
20 features are intermingled advantageously. As the Applicant notes, "With OLE,  
21 word processing users who want greater functionality can embed spreadsheet  
22 objects into their word processing documents, instead of tables." (Application,  
23 page 2, lines 13-15).

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1       The price of the increased functionality is partly in increased overhead.  
2       The Applicant notes, "Though the embedded spreadsheet visually resembles a  
3       table and provides the desired spreadsheet functionality, it logistically remains a  
4       separate program that must be invoked by the user. OLE requires that both types  
5       of application programs—a word processor and a spreadsheet—be installed on the  
6       computer." Thus, as the Applicant notes, "the OLE approach offers the full  
7       spreadsheet functionality within a word processing document" (Application, page  
8       3, lines 10-11).

9       Aspects of this architecture are not advantageous in all settings—for  
10      example, file sizes can be large—and can therefore penalize a user for putting a  
11      spreadsheet into a word processing document. Accordingly, the Applicant has  
12      developed a new software architecture designed to address many of the drawbacks  
13      of prior art technology.

14      Accordingly, the Applicant's disclosure provides a new software  
15      architecture capable of supporting a new generation of integrated spreadsheets and  
16      word processing tables. The new software architecture provides advantages over  
17      the architectures used by Microsoft's OLE, WordPerfect's WordPerfect 9, and  
18      others.

#### 19       Traversal of the §102 Rejections

20       Claims 1-12, 41-43, 82-84, 98, 102 and 103 were rejected under §102 as  
21       being anticipated by "Using Corel WordPerfect 9", hereinafter "Acklen." In  
22       response, the Applicant respectfully traverses the rejection.  
23  
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1       **Claim 1** recites an architecture comprising:

- 2
- 3       • a table appearance manager to manage how a table appears in a document; and
  - 4       • a spreadsheet functionality manager to manage spreadsheet functions for the table.
- 5

6       **Claim 4** recites, wherein the table appearance manager comprises:

- 7
- 8       • a table component to support editing functionality of the table; and
  - 9       • a spreadsheet component to receive data and formulas input into the table.
- 10

11       The Acklen reference does not disclose a software architecture to support the functionality recited by the Patent Office. Instead, the Acklen reference describes a user interface for a software program. The readership of the Acklen reference includes users who are interested in learning about software operation, *and not in the underlying structure of the software itself*. Therefore, Acklen does not disclose software structures supporting the operation of WordPerfect, such as "a table manager" or a "spreadsheet manager," as recited in claim 1. Additionally, Acklen does not disclose "a table component" or "a spreadsheet component," as recited in claim 4.

19       The Patent Office suggests that: (1) the table appearance manager is disclosed by Acklen in pages 252-284; and (2) the spreadsheet functionality manager is disclosed in pages 425-430.

22       However, examination of the Acklen reference reveals that Acklen actually just teaches operation of a user interface, *and does not teach the underlying technology of the software architecture*. For example, Acklen does not disclose a

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1 table appearance manager, and does not disclose a spreadsheet functionality  
2 manager. *Without more information, it is difficult to be certain of the nature of the*  
3 *software architecture underlying the WordPerfect 9 technology.* However, it is  
4 very likely that WordPerfect was using a technology having the drawbacks of the  
5 technologies discussed in the Background section of the Applicant's application.

6 Therefore, the Applicant has disclosed, and recited in claims 1 and 4, a new  
7 and novel table appearance manager and a new and novel spreadsheet  
8 functionality manager, as well as an interrelationship between the two. In  
9 contrast, the Acklen reference discloses a user interface. Accordingly, the  
10 Applicant respectfully requests that the section 102 rejection of claims 1 and 4 be  
11 removed, and that these claims be allowed to issue.

12 **Claims 2 and 3** depend from Claim 1 and are allowable due to their  
13 dependence from an allowable base claim. These claims are also allowable for  
14 their own recited features that, in combination with those recited in Claim 1, are  
15 neither disclosed nor suggested in references of record, either singly or in  
16 combination with one another.

17 **Claim 5** recites the architecture of claim 1, wherein the spreadsheet  
18 functionality manager comprises:

- 19
- 20 • a cell table to maintain data values and formulas used in the table;  
21 and
  - 22 • a format table to maintain formatting information used in the table.

23 The Acklen reference discloses information about a user interface, and is  
24 silent with respect to the underlying software architecture, including the  
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1 particulars of the various managers, tables, and other structures present.

2 Accordingly, Acklen discloses no cell table and no format table.

3        Additionally, the Acklen reference fails to disclose as many structures as  
4 are recited by the claims. For example, claim 1 recites "a table," while claim 5  
5 additionally recites "a cell table." These are not the same: Fig. 1 of the  
6 Applicant's disclosure shows "a table 124" and "a cell table 134." Acklen, not  
7 being concerned with the underlying technology, only recognizes the visible table,  
8 which is roughly analogous to the table 124 of the Applicant's disclosure.  
9 Therefore, while the Applicant's claims recite two tables, Acklen discloses only  
10 one table. Therefore, the portion of Acklen relied upon by the Patent Office fails  
11 to disclose the elements recited by claim 5.

12        The Patent Office suggests that pages 425-427 and 264-284 show the "cell  
13 table" and the "format table," respectively. However, the "cell table" is not  
14 analogous to the Applicant's cell table 134; instead, the table disclosed by Acklen  
15 is analogous to the Applicant's table 124.

16        Similarly, the Patent Office suggests that because format information is  
17 saved by WordPerfect, that there is a "format table." However, Acklen does not  
18 disclose a "format table," and there is no reason to believe that one exists. The  
19 format information could be saved in a variety of ways, including ways not  
20 involving a format table. For example, format information could be saved as  
21 control characters within the cell table itself. Therefore, it can be seen that Acklen  
22 does not explicitly disclose the format table recited in the Applicant's claim, and  
23 that there is no reasonable basis upon which to assume that Acklen suggests the  
24 existence of a format table.

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1 Therefore, because Acklen discloses no cell table and no format table, the  
2 Applicant respectfully requests that the rejection to claim 5 be withdrawn, and that  
3 this claim be allowed to issue.

4 Claim 6 recites the architecture of claim 1, wherein the spreadsheet  
5 functionality manager comprises:

- 6 • a cell table to maintain data values and formulas used in the table;  
7 and
- 8 • a recalculation engine to recalculate the formulas following a change  
9 to a data value or formula in the cell table.

10 The Acklen reference discloses information about a user interface, and is  
11 generally silent with respect to the underlying software architecture, including the  
12 particulars of the various managers, tables, and other structures present.  
13 Accordingly, Acklen discloses no cell table and no recalculation engine.

14 The argument included within the traversal of the rejection to claim 5 with  
15 respect to the cell table is incorporated herein by reference. The Applicant  
16 reiterates the distinction between “the cell table” of claim 6 and “the table” of  
17 claim 1, and points to the lack of analogous structures within Acklen.

18 The Patent Office suggests that because Acklen discloses that WordPerfect  
19 recalculates values that WordPerfect has a recalculation engine. However, Acklen  
20 fails to disclose a recalculation engine that recalculates formulas maintained by a  
21 cell table, and wherein both the cell table and the recalculation engine are resident  
22 within the spreadsheet functionality manager.

23 Therefore, at least because portions of Acklen relied upon by the Patent  
24 Office fail to disclose a cell table, a recalculation engine, and the relationship  
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1 between them, the Applicant respectfully requests that the rejection to claim 6 be  
2 withdrawn, and that this claim be allowed to issue.

3 **Claim 7** recites the architecture of claim 1, wherein the spreadsheet  
4 functionality manager comprises:

- 5 • a cell table to maintain data values and formulas used in the table;
- 6 • a delay parser to parse input for the cell table as needed; and
- 7 • a recalculation engine to recalculate the formulas following a change  
8 to a data value or formula in the cell table.

9 The Acklen reference discloses information about a user interface, and is  
10 generally silent with respect to the underlying software architecture, including the  
11 particulars of the various managers, tables, and other structures present.  
12 Accordingly, Acklen discloses no cell table, no delay parser and no recalculation  
13 engine.

14 The arguments included within the traversal of the rejection to claim 5 with  
15 respect to the cell table, and the argument included within the traversal of the  
16 rejection to claim 6 with respect to the recalculation engine, are incorporated  
17 herein by reference.

18 The Patent Office suggests that parsing is inherently required to determine  
19 if a formula contains an error. In response, the Applicant asserts that the Acklen  
20 reference has failed to disclose a delay parser that parses input *as needed*, and has  
21 failed to disclose parsing input for a cell table.

22 Acklen fails to disclose a delay parser, *which parses input as needed*. The  
23 Applicant has disclosed and claimed a parser that parses input *as needed*, which is  
24  
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1 an aspect not disclosed or even suggested by Acklen. Parsing data "as needed" is  
2 in contrast to other viable alternatives, such as parsing the data 'upon receipt.'

3 Acklen has also failed to disclose parsing data for the cell table. In fact,  
4 Acklen has failed to disclose a cell table. The cell table of claim 7 is analogous to  
5 the cell table 134 of Fig. 1, and is not the table of claim 1, which is analogous to  
6 the table 124 of Fig. 1. Thus, the Applicant's claims have recited two tables, i.e.  
7 "a table" in claim 1 and "a cell table" in claim 7. In contrast, Acklen does not  
8 disclose two tables. Thus, Acklen also fails to disclose parsing data for the cell  
9 table, in part because Acklen fails to disclose parsing generally, and in part  
10 because Acklen fails to disclose a cell table.

11 Therefore, because Acklen fails to disclose a cell table, a delay parser, a  
12 recalculation engine and the relationship between them and the elements of claim  
13 1, the Applicant respectfully requests that the rejection to claim 7 be withdrawn,  
14 and that this claim be allowed to issue.

15 Claims 8-10 depend from Claim 1 and are allowable due to their  
16 dependence from an allowable base claim. These claims are also allowable for  
17 their own recited features that, in combination with those recited in Claim 1, are  
18 neither disclosed nor suggested in references of record, either singly or in  
19 combination with one another.  
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1       **Claim 11** recites the architecture of claim 1, wherein multiple tables appear  
2 in one or more documents, and wherein:

- 3               • the table appearance manager comprises multiple spreadsheet  
4 components so that there is one spreadsheet component for an  
5 associated table, each spreadsheet component being configured to  
6 capture data and formulas input into the associated table;
- 7               • the spreadsheet functionality manager comprises multiple grid  
8 components so that there is one grid component for an associated  
9 table and an associated spreadsheet component, each grid component  
10 maintaining the data, the formulas, and formatting used in the  
11 associated table.

12       The Acklen reference discloses information about a user interface, and is  
13 generally silent with respect to the underlying software architecture, including the  
14 particulars of the various managers, tables, and other structures present.  
15 Accordingly, Acklen discloses no table appearance manager and no spreadsheet  
16 functionality manager.

17       The Patent Office suggests that pages 252-284 of Acklen teaches the  
18 managers recited in claim 11. The Applicant respectfully disagrees, and traverses  
19 the rejection of claim 11.

20       With respect to the first paragraph of claim 11, *the Acklen reference*  
21 *actually does not disclose a table appearance manager, multiple spreadsheet*  
22 *components, an association of one spreadsheet component to one associated table,*  
23 *or configuration of each spreadsheet component to capture data and formulas*  
24 *input into the associated table.* Instead, the Patent Office suggests that because  
25 certain functions are performed by WordPerfect, that the software configuration of  
claim 11 must be present. The Applicant respectfully disagrees. In fact, the  
Applicant has disclosed a novel and non-obvious software structure and method of

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1 operation that complement or replace older technologies such as Microsoft's OLE  
2 and WordPerfect, while still managing to perform many similar operations. The  
3 table appearance manager having the elements recited in claim 11, which is not  
4 shown or suggested by the Acklen reference, is therefore novel and non-obvious.

5 With respect to the second paragraph of claim 11, the Applicant asserts  
6 generally the same argument asserted with respect to the first paragraph, i.e. that  
7 the spreadsheet functionality manager and none of its elements recited by claim 11  
8 are shown by Acklen.

9 Therefore, Acklen fails to disclose a table appearance manager and a  
10 spreadsheet functionality manager, and more particularly fails to disclose the  
11 elements recited by claim 11 that comprise these managers. Accordingly, the  
12 Applicant respectfully requests that the rejection to claim 11 be removed, and that  
13 this claim be allowed to issue.

14 Claim 12 depends from Claim 1 and is allowable due to its dependence  
15 from an allowable base claim. This claim is also allowable for its own recited  
16 features that, in combination with those recited in Claim 1, are neither disclosed  
17 nor suggested in references of record, either singly or in combination with one  
18 another.

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1       **Claim 41**, as amended, recites one or more computer-readable media  
2 comprising computer-executable instructions for defining a computer architecture,  
3 wherein the computer architecture comprises:

- 4           • a table appearance manager to manage how a table appears in a  
5           document;
- 6           • a spreadsheet functionality manager to manage spreadsheet functions  
7           for the table;
- 8           • first and second tables renderable as part of a common document;
- 9           • a first spreadsheet component to receive at least one of data or a first  
10          formula entered into a first cell in the first table;
- 11          • a first grid component to hold the data or first formula in association  
12          with the first cell of the first table;
- 13          • a second spreadsheet component to receive at least a second formula  
14          entered into a second cell in the second table, the second formula  
15          referencing the first cell in the first table; and
- 16          • a second grid component to hold the second formula in association  
17          with the second cell of the second table.

18       **Claim 41** has been amended to include the architecture of claim 1. In  
19 response, the arguments for allowance of claim 1 are incorporated by reference  
20 herein. Accordingly, claim 41 is allowable for at least the reasons claim 1 is  
21 allowable, as well as for its own recited features that, in combination with those  
22 recited elsewhere in the claim, are neither disclosed nor suggested in references of  
23 record, either singly or in combination with one another. Therefore, the Applicant  
24 respectfully requests that the rejection to claim 41 be removed, and that this claim  
25 be allowed to issue.

26       **Claims 42-43** depend from Claim 41 and are allowable due to their  
27 dependence from an allowable base claim. These claims are also allowable for  
28 their own recited features that, in combination with those recited in Claim 41, are

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1 neither disclosed nor suggested in references of record, either singly or in  
2 combination with one another.

3 **Claim 82**, as amended, recites one or more computer-readable media  
4 comprising computer-executable instructions for defining a computer architecture,  
5 wherein the computer architecture comprises:

- 6
  - 7 • a table appearance manager to manage how a table appears in a document;
  - 8 • a spreadsheet functionality manager to manage spreadsheet functions for the table; and
  - 9 • wherein the table appearance manager and the spreadsheet functionality manager are configured for;
    - 10 • creating a first spreadsheet table for display in a document; and
    - 11 • creating a second spreadsheet table for display in the document, the second spreadsheet table being nested within the first spreadsheet table when displayed.

12  
13  
14 **Claim 82** has been amended to include the architecture of claim 1. In  
15 response, the arguments for allowance of claim 1 are incorporated by reference  
16 herein. Accordingly, claim 82 is allowable for at least the reasons claim 1 is  
17 allowable, as well as for its own recited features that, in combination with those  
18 recited elsewhere in the claim, are neither disclosed nor suggested in references of  
19 record, either singly or in combination with one another. Therefore, the Applicant  
20 respectfully requests that the rejection to claim 82 be removed, and that this claim  
21 be allowed to issue.

22 **Claims 83-84** depend from Claim 82 and are allowable due to their  
23 dependence from an allowable base claim. These claims are also allowable for  
24 their own recited features that, in combination with those recited in Claim 82, are  
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1 neither disclosed nor suggested in references of record, either singly or in  
2 combination with one another.

3 **Claim 98**, as amended, recites a computer, comprising:

- 4 • a memory;
- 5 • a processing unit coupled to the memory; and
- 6 • an architecture stored in the memory and executable on the  
7 processing unit to construct and display a document having a table  
8 with integrated spreadsheet functionality, the architecture  
9 comprising;
  - a table appearance manager to manage how a table appears in a  
document; and
  - a spreadsheet functionality manager to manage spreadsheet  
10 functions for the table.

11  
12 Claim 98 has been amended to include the architecture of claim 1.  
13 Additionally, the arguments for allowance of claim 1 are incorporated by reference  
14 herein. Accordingly, claim 98 is allowable for at least the reasons claim 1 is  
15 allowable, as well as for its own recited features that, in combination with those  
16 recited elsewhere in the claim, are neither disclosed nor suggested in references of  
17 record, either singly or in combination with one another. Therefore, the Applicant  
18 respectfully requests that the rejection to claim 98 be removed, and that this claim  
19 be allowed to issue.

20  
21 **Traversal of the §103 Rejections**

22 Claims 13 and 85-92 stand rejected under 35 U.S.C. §103(a) as being  
23 obvious over Acklen. In response, the Applicant respectfully traverses the  
24 rejection.  
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1       **Claim 13** depends from Claim 1 and is allowable due to its dependence  
2 from an allowable base claim. This claim is also allowable for its own recited  
3 features that, in combination with those recited in Claim 1, are neither disclosed  
4 nor suggested in references of record, either singly or in combination with one  
5 another.

6       **Claim 85**, as amended, recites one or more computer-readable media  
7 comprising computer-executable instructions for defining a computer architecture,  
8 wherein the computer architecture comprises:

- 9       • a table appearance manager to manage how a table appears in a  
10 document;
- 11       • a spreadsheet functionality manager to manage spreadsheet functions  
for the table; and
- 12       • wherein the table appearance manager and the spreadsheet  
13 functionality manager are configured for;
  - 14       • integrating text and a spreadsheet table within a common  
document, the spreadsheet table supporting spreadsheet  
15 functionality;
  - 16       • formatting the text according to a particular format; and
  - 17       • formatting cells in the spreadsheet table according to the  
particular format.

18       Claim 85 has been amended to include the architecture of claim 1.  
19 Additionally, the arguments for allowance of claim 1 are incorporated by reference  
20 herein. Accordingly, claim 85 is allowable for at least the reasons claim 1 is  
21 allowable, as well as for its own recited features that, in combination with those  
22 recited elsewhere in the claim, are neither disclosed nor suggested in references of  
23 record, either singly or in combination with one another. Therefore, the Applicant  
24  
25



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1 respectfully requests that the rejection to claim 85 be removed, and that this claim  
2 be allowed to issue.

3 **Claim 86** depends from Claim 85 and is allowable due to its dependence  
4 from an allowable base claim. This claim is also allowable for its own recited  
5 features that, in combination with those recited in Claim 85, are neither disclosed  
6 nor suggested in references of record, either singly or in combination with one  
7 another.

8 **Claim 87**, as amended, recites one or more computer-readable media  
9 comprising computer-executable instructions for defining a computer architecture,  
10 wherein the computer architecture comprises:

- 11 • a table appearance manager to manage how a table appears in a  
12 document;
- 13 • a spreadsheet functionality manager to manage spreadsheet functions  
14 for the table; and
- 15 • wherein the table appearance manager and the spreadsheet  
16 functionality manager are configured for;
  - 17 • integrating text and a spreadsheet table within a common  
18 document, the spreadsheet table supporting spreadsheet  
19 functionality; and
  - 20 • evaluating the text and the spreadsheet table concurrently for  
21 possible spelling or grammatical errors.

22 **Claim 87** has been amended to include the architecture of claim 1. In  
23 response, the arguments for allowance of claim 1 are incorporated by reference  
24 herein. Accordingly, claim 87 is allowable for at least the reasons claim 1 is  
25 allowable, as well as for its own recited features that, in combination with those  
recited elsewhere in the claim, are neither disclosed nor suggested in references of  
record, either singly or in combination with one another. Therefore, the Applicant

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1 respectfully requests that the rejection to claim 87 be removed, and that this claim  
2 be allowed to issue.

3 **Claim 88** depends from Claim 87 and is allowable due to its dependence  
4 from an allowable base claim. This claim is also allowable for its own recited  
5 features that, in combination with those recited in Claim 88, are neither disclosed  
6 nor suggested in references of record, either singly or in combination with one  
7 another.

8 **Claim 89**, as amended, recites one or more computer-readable media  
9 comprising computer-executable instructions for defining a computer architecture,  
10 wherein the computer architecture comprises:

- 11 • a table appearance manager to manage how a table appears in a  
12 document;
- 13 • a spreadsheet functionality manager to manage spreadsheet functions  
14 for the table; and
- 15 • wherein the table appearance manager and the spreadsheet  
16 functionality manager are configured for;
  - 17 • integrating text and a spreadsheet table within a common  
18 document, the spreadsheet table supporting spreadsheet  
19 functionality;
  - 20 • enabling a user to select a control function to modify or evaluate  
21 an aspect of the document; and
  - 22 • applying the control function across both the text and the  
23 spreadsheet table.

24 **Claim 89** has been amended to include the architecture of claim 1. In  
25 response, the arguments for allowance of claim 1 are incorporated by reference  
herein. Accordingly, claim 89 is allowable for at least the reasons claim 1 is  
allowable, as well as for its own recited features that, in combination with those  
recited elsewhere in the claim, are neither disclosed nor suggested in references of

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1 record, either singly or in combination with one another. Therefore, the Applicant  
2 respectfully requests that the rejection to claim 89 be removed, and that this claim  
3 be allowed to issue.

4 **Claims 90 and 91** depend from Claim 89 and are allowable due to their  
5 dependence from an allowable base claim. These claims are also allowable for  
6 their own recited features that, in combination with those recited in Claim 89, are  
7 neither disclosed nor suggested in references of record, either singly or in  
8 combination with one another.

9 **Claim 92**, as amended, recites one or more computer-readable media  
10 comprising computer-executable instructions for defining a computer architecture,  
11 wherein the computer architecture comprises:

- 12 • a table appearance manager to manage how a table appears in a
- 13 document;
- 14 • a spreadsheet functionality manager to manage spreadsheet functions
- 15 for the table; and
- 16 • wherein the table appearance manager and the spreadsheet
- 17 functionality manager are configured for;
  - 18 • integrating text and a first spreadsheet table within a common
  - 19 document, the spreadsheet table supporting spreadsheet
  - 20 functionality;
  - 21 • creating a second spreadsheet table by cutting or copying all or
  - 22 part of the first spreadsheet table and pasting said all or part of
  - 23 the first spreadsheet table; and
  - 24 • updating any references to cells in the first spreadsheet table or
  - 25 the second spreadsheet table to reflect the newly created second
  - spreadsheet table.

23 Claim 92 has been amended to include the architecture of claim 1. In  
24 response, the arguments for allowance of claim 1 are incorporated by reference  
25 herein. Accordingly, claim 92 is allowable for at least the reasons claim 1 is

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1 allowable, as well as for its own recited features that, in combination with those  
2 recited elsewhere in the claim, are neither disclosed nor suggested in references of  
3 record, either singly or in combination with one another. Therefore, the Applicant  
4 respectfully requests that the rejection to claim 92 be removed, and that this claim  
5 be allowed to issue.

6 Claims 44-50 and 99-101 stand rejected under 35 U.S.C. §103(a) as being  
7 obvious over Acklen in view of U.S. Pat. No. 5,630,126, hereinafter, "Redpath."  
8 In response, the Applicant respectfully traverses the rejection.

9 Claims 44-50 depend from Claim 41 and are allowable due to their  
10 dependence from an allowable base claim. These claims are also allowable for  
11 their own recited features that, in combination with those recited in Claim 41, are  
12 neither disclosed nor suggested in references of record, either singly or in  
13 combination with one another.

14 Claims 99-101 depend from Claim 98 and are allowable due to their  
15 dependence from an allowable base claim. These claims are also allowable for  
16 their own recited features that, in combination with those recited in Claim 98, are  
17 neither disclosed nor suggested in references of record, either singly or in  
18 combination with one another.

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Conclusion

The Applicant submits that all of the claims are in condition for allowance and respectfully requests that a Notice of Allowability be issued. If the Office's next anticipated action is not the issuance of a Notice of Allowability, the Applicant respectfully requests that the undersigned attorney be contacted for the purpose of scheduling an interview.

Respectfully Submitted,

Dated: 4-20-05By: 

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